

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAKE CHARLES DIVISION**

**BENJAMIN CURRY AND LATESSA  
NICOLE CURRY, ET AL**

**CIVIL ACTION NO.**

**VERSUS**

**DISTRICT JUDGE**

**CISCON SERVICES, INC., CISCON  
SERVICES USA, LLC, AND JOHN DOE**

**NOTICE OF REMOVAL OF A CIVIL ACTION**

TO THE HONORABLE JUDGES OF SAID COURT:

PLEASE TAKE NOTICE that **CISCON SERVICES, INC., CISCON SERVICES USA, LLC, AND JOHN DOE**, hereby remove the above matter from the 36th Judicial District Court, Parish of Beauregard, and file this Notice of Removal of the above-captioned civil action, to this Honorable Court, under the provisions of 28 U.S.C. § 1446(b), United States Code, and in support thereof represent unto this Court as follows:

1.

The above-captioned matter was originally commenced in the 36th Judicial District Court, Parish of Calcasieu, State of Louisiana, by the plaintiffs filing their original Joint Petition for Damages on the 11th of June, 2015.

2.

At the time plaintiffs filed their suit, diversity jurisdiction did exist between the respective parties.

3.

Citation and Petition were served upon Ciscon Services, Inc., a business incorporated in the state of Texas, with its principal place of business located in Houston, TX, through its registered agent on the 1<sup>st</sup> day of July, 2015.

4.

Citation and Petition were served upon Ciscon Services, USA, LLC, a business incorporated in the state of Texas, with its principal place of business located in Houston, TX, through its registered agent on the 25<sup>th</sup> day of June, 2015.

5.

Citation and Petition were served upon the unnamed defendant, Ciscon Services, USA LLC employee John Doe, through the registered agent of his alleged employer on the 25<sup>th</sup> day of June, 2015. Upon information and belief, this Ciscon Services, USA LLC employee referenced as John Doe is a domiciliary of Houston, TX.

6.

In this case, the plaintiffs, Benjamin and Latessa Curry, live in Rapides Parish and are citizens of the State of Louisiana.

7.

Plaintiffs are diverse to all defendants of this action. In addition, the amount in controversy exceeds, exclusive of interest and costs, the sum of \$75,000.

8.

Therefore, the defendants, CISCON SERVICES, INC., CISCON SERVICES USA, LLC, AND JOHN DOE, now file this Notice of Removal within thirty (30) days of service of the Joint Petition for Damages.

9.

The defendants also file herewith a true copy of all process, pleadings and orders served upon them in such action, same consisting of plaintiffs' Joint Petition For Damages (Exhibit A) and Citations (Exhibit B). Immediately upon the filing of this Notice of Removal, defendants will give written notice to the plaintiffs and will file a copy of the Notice with the Clerk of the 36th Judicial District Court, Parish of Beauregard and will make due proof of such services upon said parties to this Honorable Court.

10.

The defendants herein hereby request a trial by jury.

Lake Charles, Louisiana, this 6<sup>th</sup> day of July, 2015.

Respectfully submitted,

**THE THIBODEAUX LAW FIRM, L.L.C.**

BY: s/ *Terry Thibodeaux*

**TERRY THIBODEAUX**, Bar No.12736

**JEFFERY D. FRUGE**, Bar No. 32460

One Lakeshore Drive, Suite 1220

P. O. Box 2090

Lake Charles, LA 70602-2090

Telephone: (337) 433-5523

Facsimile: (337) 433-9925

Counsel for CISCON SERVICES, INC., CISCON  
SERVICES USA, LLC, AND JOHN DOE

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 6, 2015, a copy of the above and foregoing Notice of Removal of A Civil Action was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all known counsel of record by operation of the court's electronic filing system and via U.S. Mail, postage prepaid and properly addressed.

s/ Terry Thibodeaux  
**TERRY THIBODEAUX**